Site: Martha
ID #: MOD980633069
Break: 10.9
Other: AR
10/13/1986

# AMERICAN STEEL WORKS

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October 13, 1986

HAND DELIVERED

United States Environmental Protection Agency
Region VII
Office of the Regional Council
726 Minnesota Avenue
Kansas City,Kansas 66101

ATTENTION: David Tripp, Attorney

REFERENCE: American Steel Equipment
Decontamination

Gentlemen:

I received a telephone call from Mike Harper of Senator Nancy Kassebaum's office on Friday evening, 10/10/86, who related to me that if I presented a "Clean Up" plan on the essential American Steel equipment you would consider the plan's adequacy.

First I would list the items of equipment that are considered essential to the survival of American Steel as these are the items we would work on. None of this equipment was used for processing PCBs.

1. Mubea Iron Worker
2. Metal cutting band saw
3. Mig welder - Plasma Arc - Cyber Tig welder
4. Press Brake
5. 1/2" Plate Shear
6. Small Plate Roll (Webb)
7. Miscellaneous hand tools
8. Fork Truck
9. Submerged Arc Welder and Track
10. Air Compressor
11. Metal Nibbler (1/4")
12. Small Flanging machine

The basis of our proposed plan is that which is mandated by 40CFR 761.79(b) and generally used by utilities in the clean up of tools and equipment used in working on PCB and PCB contaminated

RECD
40025310
SUPERFUND RECORDS

electrical equipment as well as PCB spills on mobil equipment such as tractors.

As we read it, 40CFR-761.79 a & b say:

> §761.79 Decontamination
>
> (a) Any PCB Container to be decontaminated shall be decontaminated by flushing the internal surfaces of the container three times with a solvent containing less than 50 ppm PCB. The solubility of PCBs in the solvent must be five percent or more by weight. Each rinse shall use a volume of the normal diluent equal to approximately ten (10) percent of the PCB Container capacity. The solvent may be reused for decontamination until it contains 50 ppm PCB. The solvent shall then be disposed of as a PCB in accordance with §761.60(a). Non liquid PCBs resulting from the decontamination procedures shall be disposed of in accordance with the provisions of §761.60(a)(4).
>
> (b) Movable equipment used in storage areas shall be decontaminated by swabbing surfaces that have contacted PCBs with a solvent meeting the criteria of paragraph (a) of this section.

With the above in mind, we offer the following plan:

1. Decontamination work will be done inside a building with a sealed floor, and within a curbed area, said curb to be 6 inches high, and made of either steel or Portland cement, and

2. Solvent will be used which contains less than 2 ppm PCBs as flushing agent; i.e. Kerosene

3. The equipment shall be swabbed down with clean rags; saturated in the kerosene described in #2 above. The work will be done on plastic tarps to minimize any drip contamination.

4. The equipment will then be rubbed down with clay absorbant to remove any free liquids.

5. All personnel moving equipment and/or performing decontamination must comply with all OSHA work requirements, and

6. All liquids, residue, and waste must be stored according to 761.65, must be marked according to 761.40, and records must be maintained according to 761.180.

We believe the above meets and exceeds the letter and intent of the regulations. The work could be performed under EPA supervision either on a continuous or surprise inspection basis. Records of the operation will be generated and maintained.

We look forward to your response.

Sincerely,

AMERICAN STEEL WORKS

Walter C. Carolan

cc: Mike Harper

/scs

K158081 — 1195/100cm² (inside vat)
02 — 75/100cm² outside 2nd vat
03 — 331/400cm² = 83/100cm²
04 — N.D. Boat support
05
06

| | | | |
|---|---|---|---|
| Nibbler | 07 | 3070/200cm² | = 1535/100cm² |
| Hub Welder | 08 | 1042/" | = 520/100cm² |
| TD Welder | 09 | 1420/" | = 710/100cm² |
| Eng. Machine | 10 | 5300/" | = 2650/100cm² |
| Band saw. | 11 | 4350/200 (2) | = 2175/100cm² |
| | 12 | | |
| Hobart Welder | 13 | 238/200 | = 119/100cm² |
| Hob. Welder | 14 | 2520/200 | = 1260/100cm² |
| Hobart Welder | 15 | 2750/200 | = 1375/100cm² |
| Line. Welder | 16 | 1390/200 | = 695/100cm² |
| Metal equip. | 17 | 3965/200 | = 1982/100cm² |
| Allis Motor | 18 | 10900/200 | = 5450/100cm² |
| Drill Press | 19 | 3900/200 | 1950/100cm² |
| Pattern torch | 20 | 1040/200 | = 520/100cm² |
| Large tank | 21 | 1480/100cm² | |
| clamps | 22 | 990/100cm² | |
| Hob. Welder | 23 | 620/20 | |
| Blank | 24 | 3.1 ug (N.D.) | |
| | 25 | | |
| | 26 | | |
| Thomas Welder | 27 | 164/100cm² | |